

**UNITED STATES DISTRICT COURT  
MIDDLE DISTRICT OF TENNESSEE  
NASHVILLE DIVISION**

**IN RE: REALPAGE, INC. RENTAL  
SOFTWARE ANTITRUST LITIGATION  
(NO. II)**

Case No. 3:23-md-3071  
MDL No. 3071

**Honorable Waverly D. Crenshaw**

**Declaration of Garrett D. Blanchfield on  
Behalf of Reinhardt Wendorf &  
Blanchfield in Support of Scott & Robins  
Leadership Application**

**This Document Relates to: ALL CASES**

**DECLARATION OF GARRETT D. BLANCHFIELD ON BEHALF OF  
REINHARDT WENDORF & BLANCHFIELD IN SUPPORT OF  
SCOTT & ROBINS' LEADERSHIP APPLICATION**

I, Garrett D. Blanchfield, pursuant to 28 U.S.C. §1746, declare that the following is true and correct to the best of my knowledge and belief.

1. I am a member in good standing of the bars of the State of Minnesota (Bar No. 209855), the U.S. Court of Appeals for the Fourth and Eighth Circuits, and the U.S. District Court for the District of Minnesota.

2. I am a partner of the law firm of Reinhardt Wendorf & Blanchfield, counsel for plaintiff in *Alexander v. The Irvine Company, LLC, et al.* 3:23-cv-00440, which is part of the above-captioned multidistrict litigation (the "MDL").

3. Pursuant to this Court's April 19, 2023 Order (Dkt. No. 3) and the April 26, 2023 Stipulation and Order (Dkt. No. 25), I submit this declaration in support of the Watters Plaintiffs'

Leadership Application submitted by Scott+Scott Attorneys at Law LLP and Robins Kaplan LLP (the “Scott & Robins’ Leadership Application”).

4. I have been a litigator for 30 years. During that time, either I or Reinhardt Wendorf & Blanchfield have been appointed to leadership positions in many different complex cases, including *In re FICO Antitrust Litigation Related Cases*, Court File No. 1:20-cv-02114 (N.D.II), *In re American Express Anti-Steering Rules Antitrust Litig. (II)*, Court File No. 11-MD-02221 (EDNY), *Industrial Silicon Antitrust Litig.*, Court File No. 95-2104 (W.D. Pa.), *Wright, et al. v. Capella Education Company et al.*, Court File No.: 18-cv-01062-WMW-SER (D. Minn.) *In re Crop Inputs Antitrust Litig.*, Court File No 4:21-02993 (E.D.Mo.), *In Re: Deere & Company Repair Services Antitrust Litig.*, Court File No. 3:22-cv-50188 (N.D.II), *Bromine Antitrust Litig.*, Court File No. IP 99-9310-C-B/S (S.D. Ind.), *Park v. Konica Minolta Photo Imaging, I.S.A., Inc.*, File No. 2:05-cv-5519 (HAA) (February 13, 2005 D.N.J.), *In re Transcript International Securities Litigation*, Master File No. 4:98-CV-3099 (D. Neb.), *Naficy et al v. Sprint Spectrum, L.P.*, Civil File No. CV-98-4093 CBM (Shx) (C.D.Ca.), *Dahl v. Bain Capital Partners LLC, et al.*, Court File No. 07-cv-12388 (D. Mass.), *In re: European Rail Pass Antitrust Litigation*, Court File No. 00 Civ.691 WCC (S.D.N.Y), *In re Rubber Chemicals Antitrust Litigation*, Court File No. 02 19278 (Henn. County, Minn.), and *Lorix v. Crompton Corp., et al*, 734 N.W.2d 619 (Minn. 2007). Based on this experience and my understanding of the circumstances of this MDL, I support the Scott & Robins’ Leadership Application.

5. I am familiar with the work of Scott+Scott Attorneys at Law LLP (“Scott+Scott”) and Robins Kaplan LLP (“Robins”). For example, I am co-lead counsel for indirect purchasers in *In re FICO Antitrust Litigation Related Cases.*, Court File No. 1:20-cv-02114 (N.D.II), working alongside Scott+Scott, who is co-lead counsel for the direct purchasers. My firm worked

extensively on *In re Payment Card Interchange Fee and Merchant Discount Antitrust Litigation*, MDL 05-1720-JG-JO (S.D.N.Y.), MDL 05-1720-JG-JO (S.D.N.Y.) with Scott+Scott and Robins Kaplan, who were in leadership positions in that case. My firm also worked closely with Robins Kaplan in *Kirk Dahl, et al. v. Bain Capital Partners, LLC, et al.*, No. 07-12388 (D. Mass.), a complex antitrust class action that settled for \$590 million. In my experience, Scott+Scott and Robins litigated those cases with the utmost professionalism, dedication, and efficiency. They are eminently qualified to lead the Multifamily Plaintiffs in this MDL and I support the appointment of these two firms as interim co-lead counsel, as set forth in the Scott & Robins' Leadership Application.

6. I am also familiar with the firms who are seeking appointment to the Plaintiffs' Steering Committee as part of the Plaintiffs' Leadership Application. For example, in the last few years I worked with members of the proposed Plaintiffs' Steering Committee in complex antitrust class actions such as *In re Cattle Antitrust Litigation*, Court File No. 19-cv-01222-JRY-HB (D. Minn.), *In re Crop Inputs Antitrust Litig.*, Court File No 4:21-02993 (E.D.Mo.), and *In Re: Deere & Company Repair Services Antitrust Litig.*, Court File No. 3:22-cv-50188 (N.D.II). In each of these cases, members of the proposed Plaintiffs' Steering Committee worked cooperatively with other plaintiffs' firm, including mine. Each of these law firms is highly respected as a result of their substantial experience litigating complex antitrust class actions and achieving outstanding results for their clients and class members. I support the appointment of these firms to positions on the Plaintiffs' Steering Committee.

7. Finally, I am familiar with Tricia Herzfeld, Esq. of Herzfeld, Suetholz, Gastel, Liniski, and Wall, PLLC, and I support the appointment of Ms. Herzfeld as Plaintiffs' Liaison Counsel, pursuant to the Scott & Robins' Leadership Application.

8. Reinhardt Wendorf & Blanchfield is available and willing to assist the Scott & Robins' Plaintiffs Leadership team should they ask for our assistance in prosecuting this matter.

9. I declare under penalty of perjury that the foregoing is true and correct. Executed on this 9th day of June, 2023 at St. Paul, Minnesota.

/s/Garrett D. Blanchfield

Garrett D. Blanchfield

REINHARDT WENDORF & BLANCHFIELD

332 Minnesota Street, Suite W-1050

St. Paul, MN 55101

Tel: (651) 287-2100

Fax: (651) 287-2103

g.blanchfield@rwblawfirm.com